

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

AL MALIK ALSHAHHI, et al.

Defendants.

Case No.: 1:21-cr-00371-BMC-TAM

**DECLARATION OF JAMES A.
BOWMAN IN SUPPORT OF
DEFENDANT THOMAS J. BARRACK,
JR.'S MOTION TO DISMISS THE
INDICTMENT**

I, James A. Bowman, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney licensed to practice law in California and appearing in the above-entitled action *pro hac vice*. I am a partner with the law firm O'Melveny & Myers LLP, attorneys for defendant Thomas J. Barrack, Jr. in this matter. I respectfully submit this declaration in support of Mr. Barrack's motion to dismiss the indictment.

2. Attached as Exhibit 1 is a true and correct copy of an August 18, 2021 letter from Assistant United States Attorney Ryan Harris to Matthew Herrington, Paul Hastings LLP, then counsel to Mr. Barrack.

3. Attached as Exhibit 2 is a true and correct copy of a January 14, 2022 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

4. Attached as Exhibit 3 is a true and correct copy of a December 22, 2021 letter from Assistant United States Attorney Ryan Harris to counsel for Mr. Barrack.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from handwritten notes from an unnamed FBI agent who attended the government's June 2019 interview of Mr. Barrack, which were produced by the government in discovery in this case.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the FBI-302 memorandum of Mr. Barrack's interview by the United States Attorney's Office for the Eastern District of New York and the Federal Bureau of Investigation on June 20, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2022
Santa Barbara, CA

Respectfully submitted,

O'MELVENY & MYERS LLP



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